



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

MAR 01 2012

Mr. David Keith
Project Coordinator
Anchor QEA, LLC
614 Magnolia Avenue
Ocean Springs, MS 39654

RE: Draft Addendum 3 to the Soil Sampling and Analysis Plan for Additional Soil
Sampling South of Interstate Highway 10
San Jacinto River Waste Pits Superfund Site, Harris County, Texas
Unilateral Administrative Order, CERCLA Docket No. 06-03-10

Dear Mr. Keith:

The Environmental Protection Agency (EPA) and other agencies have performed reviews of the above referenced document dated December 29, 2011. The enclosed comments shall be incorporated in the Final Addendum 3 to the Soil Sampling and Analysis Plan and copies provided for review and approval within thirty (30) days of receipt of this letter.

If you have any questions, please contact me at (214) 665-8318, or send an e-mail message to miller.garyg@epa.gov.

Sincerely yours,

Gary Miller
Remediation Project Manager

Enclosure

cc: Luda Voskov (TCEQ)
Bob Allen (Harris County)
Nicole Hausler (Port of Houston)
Jessica White (NOAA)



653587

**Draft Addendum 3 to the Soil Sampling and Analysis Plan (SAP) for Additional Soil Sampling South of Interstate Highway 10 (I-10)
San Jacinto River Waste Pits Superfund Site
Comments:**

1. **(General):** A list of the acronyms shall be provided near the beginning of the proposal.
2. **(General):** It appears that dioxin-like PCBs were not considered in the dioxin TEQ. The EPA September 2009 draft *Recommended Toxicity Equivalency Factors (TEFs) for Human Health Risk Assessments of Dioxin and Dioxin-Like Compounds* recommends the use of the consensus TEF values for 2,3,7,8-tetrachlorodibenzo-p-dioxin and dioxin-like compounds, including polychlorinated dibenzo-p-dioxins (PCDDs), polychlorinated dibenzofurans (PCDFs), and polychlorinated biphenyls (PCBs), published in 2005 by the World Health Organization (WHO). The TEF calculations shall include dioxins, furans, and dioxin-like PCBs.
3. (Summary of Phase 1 Soil Data Analysis, p. 3): The proposal states that several chemicals were present in the subsurface soils below the reference envelope value (REV). Previous comments regarding the Preliminary Site Characterization Report (PSCR, comment number 15) addressed the statistical basis for the REV, including the consideration of outliers. Any statements in this proposal regarding REVs shall be based on the REVs consistent with the previous comments regarding the PSCR.
4. **(Selection of Soil Analytes, p. 4):**
 - a. According to the proposal, the Phase II sampling and analysis will be conducted incrementally. Four soil cores (proposed stations SJSB022, SJSB023, SJSB024, and SJSB025) will be collected first (all intervals will be analyzed for dioxins and furans, grain size, and total organic carbon). If concentrations of toxicity equivalent for dioxin and furans (TEQ_{DF}) in surface or subsurface soils of these four cores are less than or equal to TEQ_{DF} concentrations found in the most contaminated interval of previously-sampled location SJSB008 (1,880 ng/kg dry weight; 6-8 foot interval), this will be interpreted to indicate that the southern extent of paper mill waste has been described, and no samples south of the estimated impoundment perimeter will be analyzed. Environmental data are commonly highly variable; therefore, whatever the results within the impoundment area, the data from south of the impoundment are essential to characterizing and bounding the contaminant distribution. The above approach does not adequately address the nature and extent of dioxins/furans in Site soils, and these statements shall be deleted from the proposal. Further, the samples south of the impoundment shall be collected and analyzed.
 - b. The list of analytes does not include volatile or semi-volatile organic compounds. According to the Field Sampling Report for soil, a number of the soil borings in the southern impoundment area reported the presence of "sheen" and "petroleum odors". The Southwest Shipyard facility is located immediately east of the southern impoundment and according to their 2010 Annual Progress Report, 14

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Sincerely yours,

A handwritten signature in black ink, appearing to read "Gary Miller", is written over a printed name.

Gary Miller
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